

07-31
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM JOSEPH WEBB JR.,
Plaintiff,

v.

FIRST CORRECTIONAL MEDICAL,
ET. AL.,
Defendants.

CIV. ACT. NO. : 07-31-GMS

JURY TRIAL OF TWELVE REQUESTED

FILED

AUG - 2 2007

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO "STATE DEFENDANT"
GOVERNOR RUTH ANN MINNER AND STANLEY W. TAYLOR.

BD scanned

Plaintiff requests that the defendants "Minner" and "Taylor", answer the following interrogatories under oath and serve them upon plaintiff within 30 days pursuant to Fed. R. of Civ. P. Rule 33.

Governor Ruth Ann Minner's Questions:

1. What is your last completed education level? Provide, school name(s), location, and achievement obtained/completed.
2. Have you ever received any type of mail or any other types or form of communication from Plaintiff in connection with this litigation or any other matter? If yes, please state the date and nature of the letter specifically as written or otherwise known.
3. Were you present at the hearings during the months of November or December 2005 where it was brought to the attention of various officials that I was being denied medical attention due to a deliberate indifference and cruel and unusual punishment?
4. What qualifies you for sovereign immunity under the Eleventh Amendment? Provide what bank accounts your pay check is dispersed from, the bank, and a certified statement from that bank, along with any other relevant information and/or statements.

5. Do you sign the State budget that allows the Delaware Department of Corrections to operate? If yes, state all information, monetary amounts, and any specific information that is relevant.
6. While the Plaintiff is in "State custody" why isn't He in or under your care? If no, explain.
7. When you receive mail, which of your Staff reads and processes an answer on your behalf? If yes, state all names, their employment status, education level, and qualifications.
8. Have you actually read a copy of the Complaint filed against you by the Plaintiff? If no, provide specific information.
9. Are you willing to settle this matter without the embarrassment of a trial?
10. Are you aware of the answer that your attorney, Eileen Kelly has filed on your behalf?
11. Have you read the recently signed agreement signed between Carl Danberg and the Federal Justice Department?
12. What administrative remedies has the Plaintiff failed to exhaust? Provide specific information with dates and documentary evidence.
13. What amount of money is received by the State of Delaware to house the Plaintiff? State exactly the amount, where the money is received, how the money is spent.
14. How much money has the State of Delaware received while the Plaintiff has been incarcerated at all times of His incarceration from January 17, 1991 to March 21, 1991; February 1996 until March 1996; February 23, 1997 until February 5, 1998; and July 26, 1999 until the present day? Explain specific portions in explicit detail and costs dispersed for any medical, etc....
15. Have you been contacted by any business, person, or any other artificial entity in connection with this litigation? If yes, give all relevant names and addresses, including the nature of the contact and information obtained.

16. What qualifies you for qualified immunity? If yes, give all specific information in specific detail and law with complete copies.
17. What claims has the Plaintiff put forth that fall under the State Tort Claims Act, 10 Del. C. § 4001, et. seq. which entitle you to immunity? Explain in specific detail give all information.
18. Have you contacted any of the other defendants named in this litigation? If so, explain in specific detail all communications and the nature.
19. What claims has the Plaintiff put forth under state law that gives you sovereign immunity? Provide specific information in specific detail and law with complete copies.
20. How has the Plaintiff failed to state a claim upon which relief can be granted?

Governor Ruth Ann Minner's Answer Space:

1. (ANSWER)

2. (ANSWER)

3. (ANSWER)

4. (ANSWER)

5. (ANSWER)

6. (ANSWER)

7. (ANSWER)

8. (ANSWER)

9. (ANSWER)

10. (ANSWER)

11. (ANSWER)

12. (ANSWER)

13. (ANSWER)

14. (ANSWER)

15. (ANSWER)

16. (ANSWER)

17. (ANSWER)

18. (ANSWER)

19. (ANSWER)

20. (ANSWER)

Stanley W. Taylor's (Former Commissioner) Questions:

1. What is your educational level? Provide, schools and location(s), and achievements obtained/completed.
2. Were you present at the hearings held in Dover in the approximate months of November or December, 2005?
3. While the Plaintiff is in "State custody" why isn't He in or under your care? If no, explain.
4. How much was the contract signed between Delaware Department of Corrections and First Correctional Medical? State exactly how much, the time of contract, why any contracts were terminated.
5. How many times was First Correctional Medical the health care medical provider in the State of Delaware's prisons? Provide the amount of times, specific dates and times, agreed upon stipulations/protocols for services, amounts paid per contract, any reasons why the contracts were terminated.
6. Do you know if First Correction Medical, Correctional Medical Services, and Prison Health Systems are Corporate affiliated? If yes, state the name and address of the parent corporation, along with any other relevant information.
7. Did First Correctional Medical have an office in Delaware while they were the health care medical provider at Delaware's prisons? If yes, state the full address.
8. How much was the contract signed between Delaware Department of Corrections and Correctional Medical Services? State exactly how much, the time of contract, why any contracts were terminated.
9. How many times was Correctional Medical Services the health care medical provider in the State of Delaware's prisons? Provide the amount of times, specific dates and times, agreed upon stipulations/protocols for services, amounts paid per contract, any reasons why the contracts were terminated.
- 10.

10. What were the reason(s) for your departure from the Delaware Department of Corrections?
Give all relevant information.
11. Are you willing to settle this matter without the embarrassment of a trial?
12. While you were acting Commissioner, did you open your mail? If no, state all names, their employment status, education level, and qualifications.
13. Have you actually read a copy of the Complaint filed against you by the Plaintiff? If no, provide specific information.
14. Are you aware of the answer that your attorney, Eileen Kelly has filed on your behalf?
15. Have you read the recently signed agreement signed between Carl Danberg and the Federal Justice Department?
16. Have you been contacted by any business, person, or any other artificial entity in connection with this litigation? If yes, give all relevant names and addresses, including the nature of the contact and information obtained.
17. Have you contacted any of the other defendants named in this litigation? If so, explain in specific detail all communications and the nature.
18. What administrative remedies has the Plaintiff failed to exhaust?
19. What qualifies you for qualified immunity? If yes, give all specific information in specific detail and law with complete copies.
20. What claims has the Plaintiff put forth that fall under the State Tort Claims Act, 10 Del. C. § 4001, et. seq. which entitle you to immunity? Explain in specific detail give all information.
21. What claims has the Plaintiff put forth under state law that gives you sovereign immunity?
Provide specific information in specific detail and law with complete copies.
22. How has the Plaintiff failed to state a claim upon which relief can be granted?
23. Are you aware that Senate Bill 292 (Copeland) clearly states that I was in your care?

Answer Space for Stanley Taylor:

1. (ANSWER)

2. (ANSWER)

3. (ANSWER)

4. (ANSWER)

5. (ANSWER)

6. (ANSWER)

7. (ANSWER)

8. (ANSWER)

9. (ANSWER)

10. (ANSWER)

11. (ANSWER)

12. (ANSWER)

13. (ANSWER)

14. (ANSWER)

15. (ANSWER)

16. (ANSWER)

17. (ANSWER)

18. (ANSWER)

19. (ANSWER)

20. (ANSWER)

21. (ANSWER)

22. (ANSWER)

23. (ANSWER)

Submitted on this 31st day of July, 2007.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "William Joseph Webb Jr.", written over a horizontal line.

William Joseph Webb Jr.

#256056 / D/E F17 T

1181 Paddock Road

Smyrna, DE 19977

Certificate of Service

I, William D. Webb Jr., hereby certify that I have served a true

And correct cop(ies) of the attached: 1st Set of Interrogatories to
State Def.'s "Minner" and "Taylor" upon the following
parties/person (s):

TO: Eileen Kelly
820 W. French St.
Wilm., DE 19801

TO: First Correctional Medical
205 W. Girconda Way
Ste. 115
Tucson AZ 85704

TO: Patrick G. Rock
913 W. Market St Ste. 800
Wilm., DE 19801

TO: M. Ali
1181 Paddock Road
Smyrna, DE 19977

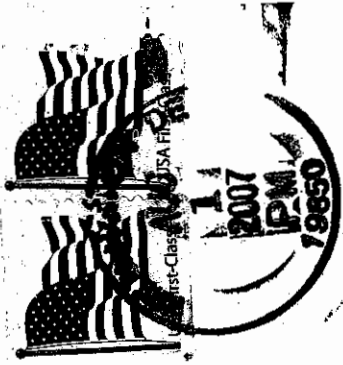
BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 31st day of July, 2007

William D. Webb Jr.

IM William J. Wells Jr.
SBI# 256052 UNIT NEEDT
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

U.S.M.S.
X-RAY



Clerk of the U.S. Dist. Ct. for DE
844 King St. Lockbox 18
Wilmington, DE
19801